

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s):	Randall E. Juenger		
Assignee:	Dell Products L.P.		
Title:	System and Method for DVI Native and Docking Support		
Serial No.:	10/689,253	Filed:	October 20, 2003
Examiner:	Matthew D. Spittle	Group Art Unit:	2111
Docket No.:	DC-05519	Customer No.:	33438

Austin, Texas
December 20, 2007

Mail Stop Appeal Brief - Patents
Board of Patent Appeals and Interferences
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF UNDER 37 CFR § 41.37

Dear Sir:

Applicant submits this Appeal Brief pursuant to the Notice of Appeal filed in this case on October 30, 2007. The fee for this Appeal Brief is being paid electronically via the USPTO EFS. The Board is also authorized to deduct any other amounts required for this appeal brief and to credit any amounts overpaid to Deposit Account. No. 502264.

I. REAL PARTY IN INTEREST - 37 CFR § 41.37(c)(1)(i)

The real party in interest is the assignee, Dell Products L.P. as named in the caption above and as evidenced by the assignment set forth at Reel 014623, Frame 0648.

II. RELATED APPEALS AND INTERFERENCES - 37 CFR § 41.37(c)(1)(ii)

Based on information and belief, there are no appeals or interferences that could directly affect or be directly affected by or have a bearing on the decision by the Board of Patent Appeals and Interferences in the pending appeal.

III. STATUS OF CLAIMS - 37 CFR § 41.37(c)(1)(iii)

Claims 1-22 are pending in the application. Claims 1-3 and 8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Digital Tigers SideCar PlusTwo Pro Specification Sheet* (DT2) in view of U.S. Patent No. 7,123,212 issued to Acharya et al. and with evidence by *Digital Tigers SideCar PlusFour Pro Installation and User Guide* (DT4). Claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over DT2 in view of Acharya with evidence by DT4 and U.S. Patent No. 6,311,263 issued to Barlow et al. Claims 5 and 6 were rejected under 35 U.S.C. § 103(a) as being unpatentable over DT2 in view of Acharya with evidence by DT4 and U.S. Patent No. 6,584,561 issued to Merkin et al. Claim 7 was rejected under 35 U.S.C. § 103(a) as being unpatentable over DT2 in view of Acharya with evidence by DT4 and U.S. Publication No. 2002/0036694 issued to Merrill. The Examiner states that Claims 9-22 are directed to a method and a system with substantially similar limitations as in Claims 1-8 above and therefore Claims 9-22 stand rejected under the same grounds. The rejection of Claims 1-22 is appealed. Appendix "A" contains the full set of pending claims.

IV. STATUS OF AMENDMENTS - 37 CFR § 41.37(c)(1)(iv)

No amendments after final have been requested or entered.

V. SUMMARY OF CLAIMED SUBJECT MATTER - 37 CFR § 41.37(c)(1)(v)

Supporting separate DVI connectors on an information handling system and docking station risks degradation of the signal sent through the DVI connectors (page 2, lines 16-32). Claim 1 recites an information handling system comprising a housing having processing components (Figure 1, element 10) that generates display information and a graphics component (Figure 2, element 28) that outputs the display information as a DVO signal. A selector (Figure 2, element 30) receives the DVO signal for selectable output to a first TMDS transmitter (Figure 2, element 32) and a first DVI connector (Figure 2, element 14) or a second TMDS transmitter (Figure 2, element 34) and docking station connector (Figure 2, element 16; page 5, lines 7-22). Claim 9 recites a method for presenting information comprising generating display information as a DVO signal (Figure 2, element 28), selectively providing the DVO signal to one of a first or second TMDS transmitter (Figure 2, element 32 and 34), transmitting the display information from a first TMDS transmitter to a DVI connector coupled to a housing (Figure 2, element 14)

and transmitting the display information from the second TMDS transmitter to a DVI connector coupled to a docking station (Figure 2, element 16; page 5, line 23 - page 6, line 22). Claim 17 recites a system for managing output of a DVI signal, the system comprising a selector (Figure 2, element 30) that receives a DVO signal, a first TMDS transmitter (Figure 2, element 32) output to a DVI connector (Figure 2, element 14) at an information handling system housing, a second TMDS transmitter (Figure 2, element 34) output to a DVI connector at a docking station (Figure 2, element 16), and a selector output selector (Figure 2 elements 22/24) to send the DVI signal to the first connector if they system is not docked and to the second connector if the system is docked (page 5, line 23- page 6, line 22). Claim 21 recites a TMDS transmitter (Figure 3, element 32) that accepts a DVO signal for output to a DVI connector, a selector (Figure 2, element 30) that switches the output between an information handling system connector 14 and a docking station connector 16 and a selector output selector (Figure 3, elements 22 and 24) that selects the connector to receive the output (page 6, line 23- page 7, line 2).

VI. GROUND OF REJECTION TO BE REVIEWED ON APPEAL - 37 CFR § 41.37(c)(1)(vi)

Claims 1-3 and 8 were improperly rejected under 35 U.S.C. § 103(a) as being unpatentable over *Digital Tigers SideCar PlusTwo Pro Specification Sheet* (DT2) in view of U.S. Patent No. 7,123,212 issued to Acharya et al. and with evidence by *Digital Tigers SideCar PlusFour Pro Installation and User Guide* (DT4). Claim 4 was improperly rejected under 35 U.S.C. § 103(a) as being unpatentable over DT2 in view of Acharya with evidence by DT4 and U.S. Patent No. 6,311,263 issued to Barlow et al. Claims 5 and 6 were improperly rejected under 35 U.S.C. § 103(a) as being unpatentable over DT2 in view of Acharya with evidence by DT4 and U.S. Patent No. 6,584,561 issued to Merkin et al. Claim 7 was improperly rejected under 35 U.S.C. § 103(a) as being unpatentable over DT2 in view of Acharya with evidence by DT4 and U.S. Publication No. 2002/0036694 issued to Merrill. The Examiner states that Claims 9-22 are directed to a method and a system with substantially similar limitations as in Claims 1-8 above and therefore Claims 9-22 stand improperly rejected under the same grounds.

VII. ARGUMENT - 37 CFR § 41.37(c)(1)(vii)

Applicant respectfully requests reversal of the rejections of Claims 1-8 and examination and allowance of Claims 9-22.

A. Claim 1

Digital Tigers SideCar PlusTwo Pro Specification Sheet (DT2) discloses an external display controller that enables a notebook computer to support two additional computer DVI display monitors through a PC Card interface.

Acharya discloses a PDA display method that uses TMDS methods to send information to a flat panel display.

Digital Tigers SideCar PlusFour Pro Installation and User Guide (DT4) discloses at page 13 a DVI Y-cable and, at page 43, a software interface to select a primary display monitor.

The references cited by the Examiner cannot make obvious Claim 1 because the references fail to teach, disclose or suggest all elements recited by Claim 1 and because no motivation exists to combine the references as the Examiner suggests. None of the references cited by the Examiner teach, disclose or suggest a “a docking connector ... operable to provide the DVI output at the housing to a docking station.” The Examiner’s position that a PC Card is a docking station has no merit and contradicts the commonly understood meaning of docking station. None of the references suggest first and second TMDS transmitters. None of the references suggest a selector with “first and second selectable outputs.” Further, the references cited by the Examiner teach away from Applicant’s Claim 1. Claim 1 recites selection between first and second outputs while the DT references focus on simultaneous presentation from plural monitors. Accordingly, Applicant respectfully requests that the Board reverse the rejection of Claim 1.

B. Claim 9

Claim 9 recites, in part, “selectively providing the DVO signal to one of a first or a second TMDS transmitter.”

Although Claim 9 remains unexamined, the references cited by the Examiner cannot make obvious Claim 9 because the references fail to teach, disclose or suggest all elements recited by Claim 9. For example, the references cited by the Examiner fail to suggest plural TMDS transmitters and teach away from selectively providing a DVO signal to one of a first and second TMDS transmitters. Accordingly, Applicant respectfully requests that the Board reverse the rejection of Claim 9.

C. Claim 17

Claim 17 recites, in part, “a selector output selector operable to provide the DVO signal to the first TMDS selector if the information handling system is not coupled to the docking station and further operable to provide the DVO signal to the second TMDS selector if the information handling system couples to the docking station.”

Although Claim 17 remains unexamined, the references cited by the Examiner cannot make obvious Claim 17 because the references fail to teach, disclose or suggest all elements recited by Claim 17. For example, the references cited by the Examiner fail to teach, disclose or suggest a “selector output selector” that selects where to output a DVO signal based on whether or not an information handling system couples to a docking station. For instance, no basis exists to suggest that the DT reference would select to send a DVO signal to a PC Card rather than a normal external monitor cable if the PC Card was inserted. Accordingly, Applicant respectfully requests that the Board reverse the rejection of Claim 17.

D. Claim 21

Claim 21 recites, in part, “a selector interfaced with the TMDS transmitter and operable to switch the display information output by the TMDS transmitter to a DVI connector associated

with an information handling system housing or a DVI connector associated with a docking connector.”

Although Claim 21 remains unexamined, the references cited by the Examiner cannot make obvious Claim 21 because the references fail to teach, disclose or suggest all elements recited by Claim 21. For example, the references cited by the Examiner fail to teach, disclose or suggest a “selector” that switches output from a TMDS transmitter to a DVI connector associated with an information handling system housing or a DVI connector associated with a docking connector. The DT reference cited by the Examiner cannot be modified to switch a TMDS output between two connectors because the PC Card used by the DT reference cannot accept or output a DVI signal. Further, the DT reference seeks to use multiple displays, not select between display outputs. Accordingly, Applicant respectfully requests that the Board reverse the rejection of Claim 21.

VIII. CLAIMS APPENDIX - 37 CFR § 41.37(c)(1)(viii)

A copy of the pending claims involved in the appeal is attached as Appendix A.

IX. EVIDENCE APPENDIX - 37 CFR § 41.37(c)(1)(ix)

None

X. RELATED PROCEEDINGS APPENDIX - 37 CFR § 41.37(c)(1)(x)

There are no related proceedings.

XI. CONCLUSION

For the reasons set forth above, Applicant respectfully submits that the rejection of pending Claims 1-22 is unfounded, and requests that the rejection of claims 1-22 be reversed.

I hereby certify that this correspondence is being electronically submitted to the COMMISSIONER FOR PATENTS via EFS on December 20, 2007.

/Robert W. Holland/

Attorney for Applicant(s)

Respectfully submitted,

/Robert W. Holland/

Robert W. Holland
Attorney for Applicant(s)
Reg. No. 40,020

CLAIMS APPENDIX “A” - 37 CFR § 41.37(c)(1)(viii)

1. An information handling system comprising:
 - a housing;
 - processing components disposed in the housing and operable to generate display information;
 - a graphics component interfaced with the processing components and operable to output the display information as a DVO signal;
 - a selector interfaced with the graphics component to receive the DVO signal and having first and second selectable outputs;
 - a first TMDS transmitter interfaced with the first selectable multiplexer output and operable to transmit the DVO signal as a DVI output;
 - a first DVI connector interfaced with the first TMDS transmitter and operable to provide the DVI output at the housing to an external display;
 - a second TMDS transmitter interfaced with the second selectable selector output and operable to transmit the DVO signal as a DVI output; and
 - a docking connector interfaced with the second TMDS transmitter and operable to provide the DVI output at the housing to a docking station.
2. The information handling system of Claim 1 further comprising:
 - a docking station operable to couple to the housing and to accept the docking connector; and
 - a second DVI connector interfaced with the docking connector and operable to provide the DVI output at the docking station to an external display.

3. The information handling system of Claim 2 further comprising:
 - a docking station detector operable to determine insertion of the information handling system into the docking station; and
 - a switch interfaced with the docking station detector and the selector and operable to select the first TMDS transmitter if the housing is not coupled to the docking station and to select the second TMDS transmitter if the housing is coupled to the docking station.
4. The information handling system of Claim 3 wherein the selector and the first and second TMDS transmitters are fabricated as an application specific integrated circuit.
5. The information handling system of Claim 3 wherein the graphics component comprises a graphics and memory controller hub.
6. The information handling system of Claim 3 wherein the graphics component comprises a graphics processor unit.
7. The information handling system of Claim 3 further comprising a projector operable to interface with the first DVI connector to present the display information when the housing is not coupled into the docking station.
8. The information handling system of Claim 3 further comprising a display monitor operable to interface with the second DVI connector to present the display information when the housing is coupled into the docking station.
9. A method for presentation of display information from an information handling system, the method comprising:
 - generating the display information as a DVO signal from a graphics component;
 - selectively providing the DVO signal to one of a first or a second TMDS transmitter;
 - transmitting display information from the first TMDS transmitter to a DVI connector coupled to a housing; and

transmitting display information from the second TMDS transmitter to a DVI connector coupled to a docking station.

10. The method of Claim 9 further comprising interfacing the housing DVI connector to a projector.

11. The method of Claim 9 further comprising interfacing the docking station DVI connector to a display monitor.

12. The method of Claim 9 wherein selectively providing the DVO signal further comprises:
determining if the housing is coupled to the docking station;
selecting the first TMDS transmitter if the housing is not coupled to the docking station;
and
selecting the second TMDS transmitter if the housing is coupled to the docking station.

13. The method of Claim 12 wherein determining if the housing is coupled to the docking station further comprises activating a switch by the insertion or removal of the housing into the docking station.

14. The method of Claim 13 wherein selectively providing the DVO signal further comprises:
communicating the DVO signal to a selector; and
switching the output of the DVO signal from the selector to the first or second TMDS transmitter based on activation of the switch by insertion or removal of the housing into the docking station.

15. The method of Claim 14 wherein the graphics component comprises a graphics processor unit.

16. The method of Claim 14 wherein the graphics component comprises a graphics and memory controller hub.

17. A system for managing output of a DVI signal, the system comprising:
a selector operable to accept a DVO signal having display information;
a first TMDS transmitter interfaced with the selector and operable to output the display information to a DVI connector at an information handling system housing;
a second TMDS transmitter interfaced with the selector and operable to output the display information through a docking connector to a DVI connector at a docking station; and
a selector output selector operable to provide the DVO signal to the first TMDS selector if the information handling system is not coupled to the docking station and further operable to provide the DVO signal to the second TMDS selector if the information handling system couples to the docking station.
18. The system of Claim 17 wherein the selector, the first TMDS transmitter and the second TMDS transmitter are integrated into an application specific integrated circuit.
19. The system of Claim 17 further comprising a graphics and memory controller hub interfaced with the selector and operable to output the DVO signal.
20. The system of Claim 17 further comprising a graphics processor unit interfaced with the selector and operable to output the DVO signal.
21. A system for managing output of a DVI signal, the system comprising:
a TMDS transmitter operable to accept a DVO signal having display information and to output the display information to a DVI connector at an information handling system housing;
a selector interfaced with the TMDS transmitter and operable to switch the display information output by the TMDS transmitter to a DVI connector associated with an information handling system housing or a DVI connector associated with a docking connector; and
a selector output selector operable to select the housing DVI connector if the information handling system is not coupled to the docking station and further operable to

select the docking module connector if the information handling system couples to the docking station.

22. The system of Claim 21 wherein the TMDS transmitter and the selector are integrated in an application specific integrated circuit.

EVIDENCE APPENDIX - 37 CFR § 41.37(c)(1)(ix)

None

RELATED PROCEEDINGS APPENDIX - 37 CFR § 41.37(c)(1)(x)

There are no related proceedings.